



HON. SYLVIA O. HINDS-RADIX
Corporation Counsel

THE CITY OF NEW YORK
LAW DEPARTMENT
100 CHURCH STREET
NEW YORK, NY 10007

DAVID S. THAYER
Assistant Corporation Counsel
t: (212) 356-2649
f: (212) 356-1148
e: dthayer@law.nyc.gov

August 15, 2023

Via ECF

The Honorable Edgardo Ramos
United States District Court for the
Southern District of New York
40 Foley Square
New York, NY 10007

Re: **Nampiaparampil v. N.Y.C. Campaign Fin. Bd., et al.**
No. 23 CV 6391 (ER)

Dear Judge Ramos:

I am an Assistant Corporation Counsel in the Office of the Corporation Counsel of the City of New York,¹ the Honorable Sylvia O. Hinds-Radix, attorney for the New York City Campaign Finance Board (“CFB”) in the above-referenced action. I write to respectfully request an alignment, and extension, of all Defendants’ deadlines by which to respond to the Complaint to September 29, 2023. Plaintiff’s counsel has informed me that Plaintiff does not object to the requested extension.

This action grows out of the campaign conducted by the 2021 Republican candidate for the office of Public Advocate in the government of the City of New York, Plaintiff Devi Nampiaparampil. Specifically, Plaintiff asserts that, in the course of her campaign, her right to freedom of speech was infringed by the CFB and its employees, that she was compelled to speak in a manner inconsistent with her running platform, and that she was subsequently retaliated against. Plaintiff asserts her claims under the U.S. and N.Y. Constitutions and names the CFB as a defendant, as well as seven individuals who were allegedly employed by the CFB.

¹ The Office of the Corporation Counsel is also known as the New York City Law Department.

I was recently assigned to handle this action and am still investigating the facts underlying the allegations contained in the Complaint. Additionally, I have begun the administrative process necessary to establish the representation status of the seven individual Defendants. The requested alignment and extension of *all* Defendants' time to respond to the Complaint will serve to provide time to complete this process, as well as permit further investigation of the Complaint's allegations such that a thorough and appropriate response can be interposed. The extension will also account for a planned vacation in the coming weeks.

This is the CFB's first request for an extension of the time by which it must respond to the Complaint. The CFB must presently respond to the Complaint by today, August 15, 2023. The requested extension, and the concomitant alignment of the individual Defendants' deadlines, would move CFB's and those Defendants' deadlines to September 29, 2023. As noted, Plaintiff's counsel has informed me that Plaintiff does not object to this requested extension.

I thank the Court for its consideration of this request.

Respectfully yours,

/s/ David S. Thayer

David S. Thayer

cc: ***Via ECF***
All counsel of record